

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TODD WOLF,

Plaintiff,

Case No.: 23-cv-149

v.

CITY OF SHEBOYGAN, MAYOR RYAN SORENSON in his individual and official capacities, CITY ATTORNEY CHARLES ADAMS in his individual and official capacities, ALDERPERSONS ON SHEBOYGAN'S COMMON COUNCIL, BARBARA FELDE, ROBERTA FILICKY-PENESKI, AMANDA SALAZAR, ANGELA RAMEY, BETTY ACKLEY, ZACHARY RUST, DEAN DEKKER, GRAZIA PERRELLA, all in their individual and official capacities; SHEBOYGAN AREA SCHOOL DISTRICT BOARD MEMBER MARY LYNNE DONOHUE, in her individual and official capacities; and JILL PEDIGO HALL,

Defendants.

DEFENDANTS CITY OF SHEBOYGAN, CITY ATTORNEY ADAMS, MAYOR SORENSON, ALDERPERSONS BETTY ACKLEY, DEAN DEKKER, BARBARA FELDE, ROBERTA FILICKY-PENESKI, GRAZIA PERRELLA, ANGELA RAMEY, ZACHARY RUST, AMANDA SALAZAR, AND MARY LYNNE DONOHUES' CIVIL L.R. 7(H) EXPEDITED NON-DISPOSITIVE MOTION TO ENLARGE TIME TO DISCLOSE EXPERT WITNESSES

Defendants City of Sheboygan, City Attorney Charles Adams, Mayor Ryan Sorenson, Alderpersons Betty Ackley, Dean Dekker, Barbara Felde, Roberta Filicky-Peneski, Grazia Perrella, Angela Ramey, Zachary Rust, Amanda Salazar, and Sheboygan Area School District Board Member Mary Lynne Donohue ("Defendants") by and through their undersigned attorneys, and move this Court, pursuant to Civil L.R. 7(h), for an Order to enlarge the timeframe for

Defendants to disclose their expert witnesses in this matter through May 15, 2024. In support of this Motion, Defendants state as follows:

1. On January 10, 2024, the parties filed a Joint Unopposed Non-Dispositive Motion Under Rule 7(h) to Extend Deadline for Expert Disclosures. **Dkt 73.**

2. The Court entered an Order on January 11, 2024 granting the parties' joint motion for extension of time. **Dkt 74.**

3. Plaintiff's deadline to disclose expert witnesses was extended to February 15, 2024.

4. Defendants' deadline to disclose expert witnesses was extended to April 15, 2024.

5. On February 15, 2024, Plaintiff provided fully redacted expert reports pending the Court's entry of a Protective Order in this matter.

6. Thirty (30) of the Defendants' allotted sixty (60) days will have passed by March 15, 2024 and Defendants do not yet have Plaintiff's unredacted expert opinions and are currently unable to evaluate whether an expert will be necessary.

7. Defendants respectfully request an extension of thirty (30) days to disclose their expert witnesses to May 15, 2024.

8. Defendants may require additional time depending on when the Protective Order is entered in this matter and when Plaintiff provides unredacted copies of his experts' reports.

9. The undersigned communicated with Plaintiff's counsel and was advised that Plaintiff does not resist this Motion to Extend the Deadline for Defendants' Expert Disclosures.

WHEREFORE, Defendants City of Sheboygan, City Attorney Charles Adams, Mayor Ryan Sorenson, Alderpersons Betty Ackley, Dean Dekker, Barbara Felde, Roberta Filicky-Peneski, Grazia Perrella, Angela Ramey, Zachary Rust, Amanda Salazar, and Sheboygan Area School District Board Member Mary Lynne Donohue respectively request that the Court GRANT

their Motion to enlarge the timeframe for Defendants to disclose their expert witnesses in this matter through May 15, 2024.

Dated this 18th day of March, 2024.

MWH LAW GROUP LLP

Attorneys for Defendants City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Alderperson Betty Ackley, Alderperson Dean Dekker, Alderperson Barbara Felde, Alderperson Roberta Filicky-Peneski, Alderperson Grazia Perrella, Alderperson Angela Ramey, Alderperson Zachary Rust, Alderperson Amanda Salazar, and President Sheboygan Area School District Mary Lynne Donohue

By: /s/ Electronically signed by Warren E. Buliox

Warren E. Buliox SBN 1056215

Julie T. Bittner SBN 1128144

Kerrie M. Murphy SBN 1122869

735 N. Water Street, Suite 610

Milwaukee, WI 53202

Telephone: (414) 436-0353

Facsimile: (414) 436-0354

warren.buliox@mwhlawgroup.com

julie.bittner@mwhlawgroup.com

kerrie.murphy@mwhlawgroup.com